

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Time Warner Cable's Petition For	)	WC Docket No. 06-55
Declaratory Ruling That Competitive	)	
Local Exchange Carriers May	)	
Obtain Interconnection To Provide	)	
Wholesale Telecommunications Services	)	
To VoIP Providers	)	

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission's rules,<sup>1</sup> John Staurulakis, Inc. ("JSI") respectfully requests an extension of time for filing comments in response to the invitation of the Federal Communications Commission ("FCC" or "Commission") to comment on a petition filed by Time Warner Cable ("TWC") seeking a declaratory ruling that competitive local exchange carriers ("LECs") are entitled to interconnect with incumbent LECs for the purpose of exchanging traffic on behalf of VoIP-based providers ("Petition").<sup>2</sup> JSI is a consulting firm offering regulatory, financial and business development services to more than two hundred rate-of-return incumbent LECs throughout the United States. The issues raised in the Petition have significant implications for JSI clients. Accordingly, JSI will be submitting comments and actively participating in this proceeding.

In the Declaratory Ruling PN, the Commission determined that initial comments would be due March 27, 2006, thereby allowing only 21 days for parties to comment. As described

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<sup>1</sup> 47 C.F.R. §1.46

<sup>2</sup> *Pleading Cycle Established For Comments on Time Warner Cable's Petition For Declaratory Ruling That Competitive Local Exchange Carriers May Obtain Interconnection To Provide Wholesale Telecommunications Services To VoIP Providers*, WC Docket No. 06-55, Public Notice, DA 06-534 (rel. Mar. 6, 2006) ("Declaratory Ruling PN").

below, the Petition raises several issues of importance for all telecommunications carriers which are all very complex. For example, the Petition references specific cases in Nebraska and South Carolina as well as decisions in New York, Illinois, Iowa, Ohio and Texas. In order to adequately prepare and address the case-specific facts associated with these various state proceedings, more than the 21-day allocation is necessary. Accordingly, JSI respectfully requests the Commission to extend the time for filing comments an additional 30 days.

JSI recognizes that extensions of time are not routinely granted. However, JSI submits the public interest would be served by granting this extension of time in this proceeding. JSI notes that the Wireline Competition Bureau recently established a 60 day comment deadline on a petition to forbear from Section 251 and Section 252 duties and then extended that deadline an additional 24 days.<sup>3</sup> In the ACS PN, the Commission found that granting the extension was in the public interest because “other parties will benefit equally from an extension of the comment deadline” and that extending the deadline “will enable the Commission to obtain a more complete and well-developed record in this proceeding.”<sup>4</sup> Because this proceeding also pertains to Section 251 and Section 252 duties and involves matters that are fact-specific in multiple states, for similar reasons it would be in the public interest to extend the comment deadline by 30 days – making a total of 51 days for initial comments in this proceeding. Such action by the Commission would ensure development of a full record regarding the important issues raised by the Petition.

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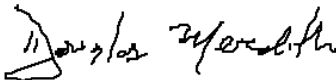
<sup>3</sup> See, *Wireline Competition Bureau Grants Request for Extension of Time To File Comments on Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as Amended, For Forbearance From Sections 251(c)(3) and 252(D)(1) in the Anchorage LEC Study Area*, WC Docket No. 05-281, Public Notice, DA 05-3145 (rel. Dec. 5, 2005) (“ACS PN”). In the ACS PN, the Commission cites the initial Public Notice which was released October 14, 2005 establishing a comment date of December 13, 2005 and then grants an extension for filing comments until January 9, 2006. *Id.* at 1.

<sup>4</sup> *Id.*

For the foregoing reasons, JSI requests that the date for filing initial comments be extended by 30 days to April 26, 2006 and that the date for filing reply comments be extended to May 11, 2006.<sup>5</sup>

Respectfully submitted,

**John Staurulakis, Inc.**

By: 

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March 16, 2006

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<sup>5</sup> JSI notes that on the same date that the Commission released its Declaratory Ruling PN, the Commission also released a Public Notice seeking comments on a related petition filed by TWC. *See Pleading Cycle Established For Comments on Time Warner Cable's Petition For Preemption Regarding the South Carolina Public Service Commission's Denial of a Certificate of Convenience and Necessity*, WC Docket No. 06-54, Public Notice, DA 06-535 (rel. Mar. 6, 2006) ("Preemption PN"). Because many of the same issues are raised by TWC in both the Declaratory Ruling PN and the Preemption PN, JSI respectfully requests that the comment deadline be extended for an additional 30 days in both proceedings.

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion for Extension of Time was served this 16th day of March, 2006, by e-mailing true and correct copies thereof to the following persons:

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Wireline Competition Bureau  
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I hereby certify that the foregoing Motion for Extension of Time was served this 16th day of March, 2006, by mailing true and correct copies thereof, postage prepaid, to the following persons:

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/s/ Marty Kluh

Marty Kluh